## REMARKS/ARGUMENTS

This Amendment is in response to the Office Action dated November 3, 2005, in which the Examiner rejected claims 1-10, 12-15, 17 and 19-23 under 35 U.S. C. § 103(a) as being unpatentable over US Patent No. 6,324,266 ("**Mannings**") in view of US Patent No. 6,873,688 ("**Aarnio**").

By the present response, Applicant does not propose amending the claims. Rather, Applicant respectfully traverses the rejection of the claims, and requests reconsideration in light of the remarks herein.

As described in the previous response, and as embodied in amended claim 1, Applicant's invention is a method for compiling data in a computerized data authorizing system. The method gathers data from *both of two different kinds of data sources*, i.e., telephone responses using an interactive voice response system *and* Internet responses using an Internet data entry system. Both kinds of responses are routed to a *single data bank*, and duplicate responses are prevented by tagging the responses. Tagging is accomplished using *automated number identification for telephone responses* and using *"cookies" for Internet responses*. The data from *both* of the different data sources captured in the data bank are then used to analyze a campaign.

Thus, in claim 1, Applicant specifically recites (among other things):

"gathering data from a plurality of different kinds of data sources"

"inviting telephone responses using an interactive voice response system as one data source;"

"inviting Internet responses using an Internet data entry system as a different data source to a data-gathering campaign;"

"automatically routing the telephone responses and the Internet responses to a single data bank;" and

"preventing duplicate responses by tagging responses, including the use of automated number identification (ANI) for telephone responses and the use of cookies for Internet responses."

In the Examiner's remarks pertaining the rejection of claim 1 (page 3 of the Remarks), there is no mention of Applicant's recitation of "different kinds of data sources," "telephone responses using an interactive voice response system as one data source," "Internet responses using an Internet data entry system as a different data source," or "automated number identification (ANI) for telephone responses" and "cookies for Internet responses," as all recited in claim 1. While this may have been an inadvertent omission in the Office Action, it is Applicant's position is that the two cited references do not show the specific combination of these elements.

In the Examiner's remarks it is stated that **Aarnio** discloses receiving data from "multiple data sources" (page 3 of the Remarks). However, this is not Applicant's invention. Applicant's invention does not involve merely multiple data sources (i.e., a plurality of data sources that may be of the *same* kind), but rather involves the use of two *different*, specifically defined kinds of data sources.

The Examiner also states that **Aarnio** describes "both telephone responses and Internet responses." *id*.

First, Applicant respectfully disagrees with the Examiner's position that **Aarnio** teaches gathering data by both telephone responses and Internet responses. **Aarnio** uses only one kind of terminal, i.e., "a telephone, PDA (personal digital assistant) or another device with means for *making a data transmission* connection between the terminal device and the central device, i.e., the terminal device *can transmit and receive data transmission packets...*"(col. 3, lines 28-32, emphasis added). Such a system is clearly not the one recited in the method of claim 1, which includes both "telephone responses using an interactive voice response system" and "Internet responses using an Internet data entry system."

Secondly, **Mannings** and **Aarnio** teach away from Applicant's invention, and thus Applicant believes they are not properly combined to teach Applicant's invention. In particular, both **Mannings** and **Aarnio** teach systems that use *one kind of data source*. In **Mannings** the data sources are all conventional voice-based telephone devices where data is submitted using the DTMF keys of the telephone (see, e.g., Abstract). In **Aarnio**, the data sources are all intelligent wireless terminals or phones for transmitting data packets using

sophisticated data transmission protocols such as WAP, SMS or HTTP (see, e.g., col. 3, lines 41-46). Since each teaches the use of only one kind of data source, they in fact teach away from using different kinds of data sources, including both "telephone responses using an interactive voice response system" and "Internet responses using an Internet data entry system."

Furthermore, since neither reference teaches the use of both a telephone/IVR-based system and an Internet-based system for collecting data, there is no suggestion to use two different data sources with a "single data bank which is common to both a telephone response path and an Internet response path."

The dependent claims each recite further limitations in combination with the limitations of claim 1, and are believed allowable for the same reasons as stated above.

## Conclusion

In view of the foregoing, Applicant believes all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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